REMARKS/ARGUMENTS

This Amendment is in response to the Office Action dated January 30, 2008.

Claims 1, 3-6 and 12-14 have been rejected. Accordingly, claims 1, 3-6 and 12-14

remain pending in the present application.

Claim Rejections – 35 USC 102

Claims 1, 3-6, and 12-14 are rejected under 35 U.S.C. 102(e) as being

anticipated by Chang et al. (U.S. Patent No. 6,775,733 hereinafter "Chang").

The Examiner stated:

3.   Referring to claim 1 and 12, Chang teaches a device comprising:

a processor (see either of items 142 or 146 in figure 5); and

a single USB interface (see item 104), the interface comprising a USB root hub host port coupled to a first USB bus (see item 132 in figure 5 connected to item 108 via a first USB bus); and

a USB peripheral port (see items 134 in figure 5) coupled to a second USB bus wherein the USB root hub host port and the USB peripheral port are defined using predetermined signals and where the USB port root hub port and the USB peripheral port are both active at the same time (Note ports 134 are connected to downstream devices, when data is read from these devices to the host the data is transferred from the downstream device, through the interface 104 to the host system, thus the ports are active at the same time. This data is transferred using the predetermined differential USB signals).

Applicant respectfully disagrees.

Applicant respectfully submits that the Examiner's rejection of Claims 1 and

12 is a result of a misunderstanding of the Chang patent. Item 132 of Chang is not a

USB port, it is only the internal logic of a USB root hub extender (the ERHP device,

#104). This is clear when one realizes any USB port must have a PHY (physical

interface) which item 132 does not. Secondly, item 134 in figure 5 of Chang is only a

PHY and is part of a USB host port, not a USB peripheral port as cited by the

Examiner.

4.   Referring to claims 3 and 4, Chang teaches two connected devices utilizing the single USB interface can have a peer-to-peer connection via the USB root hub host port and the USB peripheral port or a one-to-many relationship via either the USB root hub post port and/or the USB peripheral port (see figure 4 and lines 16-30 of column 3).

There is no reference in the Chang patent to peripheral ports being part of any

USB interface and there is no reference to peer-to-peer connections. Chang interface

strictly deals with extension of USB host ports in a standard motherboard

environment and Chang neither teaches nor suggests a single USB interface with

both a USB root hub port and a USB peripheral port both active at the same time, as

recited in the claims.

5.   Referring to claim 5, Chang teaches a device incorporating the USB interface is able to communicate with a second USB device' using only needs one USB port of the second device to communicate via the single USB interface (see lines 24-35 of column 4).

Claim 5 of the petitioner's application is based upon a specific

implementation of DPUSB interface recited in Claim 1. Since Chang does not teach

or suggest a single interface with both a USB root hub port and a USB peripheral

device port, Applicant respectfully submits that the Examiner's rejection is without

merit.

6.   Referring to claim 13, Chang teaches USB interface requires a connection to only one physical r/o port of a second device is and this physical r/o port can be either a USB host port or a USB peripheral port which is defined using the predetermined signals (see figure 4, note the interface can be connected to both a virtual root hub 108 (i.e., USB host port) and a device 136 (peripheral port).

Claim 13 of the petitioner's application is based upon a specific

implementation of DPUSB device recited in Claim 12. Since Chang neither teaches

nor claims a device with both a USB root hub port and a USB peripheral device port,

Applicant respectfully submits that the Examiner's rejection is without merit.

7.   Referring to claims 6 and 14, Chang teaches the predetermined signals comprise host and peripheral differential lines (see lines 32-39 of column 2, note these differential data lines are part of the USB specification and the devices taught by Change are USB devices).

Claim 6 recites a specific implementation of DPUSB interface. Claim 14

recites a specific implementation of DPUSB device. Since Chang neither teaches nor

claims an interface or single device with both a USB root hub port and a USB

peripheral device port, Applicant respectfully submits that the Examiner's rejection

is without merit.

Summary

Applicant respectfully submits that the rejection of the claims based upon

Chang have been overcome. Chang does not teach nor suggest a single USB

interface comprised of both a USB root hub host port and a USB peripheral port as

recited in Applicant's claimed invention. The Chang patent discloses that USB host

ports may be electrically and physical extended in a standard motherboard design and

describes and claims attributes of a combination interface referred to as an "ERHP"

which means a "External Root Hub with PHY's" that combines input interfaces

labeled SMI+RMOI+UTI ("Serial Media Interface" + "Registers Mapping Interface"

+ "Universal Transceiver Macrocell Interface") with standard USB host output ports

including USB host physical interfaces or "PHY's" (see reference 104). No where in

the Chang patent is there any claim to a USB device port as being part of the ERHP.

Indeed, the only references to USB peripheral devices or ports are as entities to

which the Chang patent interface, the ERHP, is intended to connect to.

Accordingly, Applicant respectfully requests reconsideration and allowance of the claims as now presented.

Conclusion

Applicant's attorney believes this application in condition for allowance. Should any unresolved issues remain, Examiner is invited to call Applicant's attorney at the telephone number indicated below.

Respectfully submitted,

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